



August 13, 2020

***Via ECF and courtesy copy via email:  
(ALCarterNYSDChambers@nysd.uscourts.gov)***

Honorable Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 435  
New York, New York 10007

**Re: 1:19-cv-02978-ALC and 1:20-cv-01791-ALC  
Plaintiffs' Request for Adjournment and Stay or Pre-Motion Conference**

Dear Judge Carter:

Our office, as counsel for Plaintiffs Hoechstetter, *et al.* in the above-referenced matter and in accordance with Your Honor's Individual Practices, writes to advise the Court of recent developments between the parties.

On July 30, 2020, the undersigned counsel for Plaintiffs together with counsel for Defendants Columbia University, *et al.* and New York Presbyterian Hospital executed an "Agreement" memorializing the parties' belief that "...it is in their mutual interest to pursue settlement of the Claims at this time" and "that the parties agree to proceed in good faith ...." Pursuant to the Agreement, in part, each Claimant will provide a questionnaire to Defendants Columbia University, *et al.* and New York Presbyterian Hospital within the 45-day timeline prescribed. Additionally, the parties will engage the services of a mediator to assist them in settlement negotiations.

In light of the parties' mutual assent to the terms of the Agreement, and their desire to work together in hopes of achieving a resolution, Plaintiffs' counsel respectfully requests with the consent of all parties that the Court adjourn the August 20th conferences in the above-referenced actions, and stay all proceedings in both actions for a period of ninety (90) days from the Court's Order granting such stay. A stay of the proceedings would provide the parties the ability to fully engage in comprehensive alternative dispute resolution.

Thank you for your attention to this matter and consideration of the foregoing.

Very truly yours,

Adam P. Slater, Esq.  
*Counsel for Plaintiffs*  
Slater Slater Schulman LLP

**cc: All Parties Via ECF  
Magistrate Judge Katharine H. Parker Via Email:  
Parker\_NYSDChambers@nysd.uscourts.gov**